



U.S. Department of Justice

United States Attorney Eastern District of New York

JAM/MEM F. #2017R00509

271 Cadman Plaza East Brooklyn, New York 11201

December 7, 2021

By ECF

The Honorable LaShann DeArcy Hall United States District Judge Eastern District of New York 225 Cadman Plaza East Brooklyn, New York 11201

Re: United States v. Karl Jordan, Jr., et al.

Criminal Docket No. 20-CR-305 (LDH)

Dear Judge DeArcy Hall:

After conferring with counsel for each of the defendants in the above-referenced case, the government respectfully writes in response to the Court's order directing the parties to file a joint status report by December 10, 2021 in lieu of an in-person appearance. The government also respectfully requests, with consent of each of the parties, that the intervening time between November 15, 2021 and the next status conference, scheduled for January 28, 2022, be excluded from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A).

The parties last appeared before Your Honor on November 15, 2021. The government continues to produce additional discovery to the defendants, including expert witness disclosures, pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Rules 702, 703 and 705 of the Federal Rules of Evidence. Counsel for the defendants continue to review the discovery produced thus far, and the parties have discussed the nature and scope of anticipated motion practice, as well as potential trial dates.

As the production and review of discovery in this case is ongoing, the parties jointly request and agree that excluding the intervening time, from November 15, 2021 to January 28, 2022, from the calculation of the Speedy Trial Act time limitations, pursuant to Title 18, United States Code, Section 3161(h)(7)(A), would serve the ends of justice.

As noted above, we have spoken with counsel for each defendant about these matters, all of whom consent to the requests herein.

Respectfully submitted,

BREON PEACE United States Attorney

By: /s/

Artie McConnell Mark E. Misorek Assistant U.S. Attorneys (718) 254-7000

cc: All Counsel of Record (by ECF)